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3 **LJU LAW FIRM**
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7 **UNITED STATES DISTRICT COURT**
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DISTRICT OF NEVADA

10 ANGEL GARCIA,

CASE NO.: 3:21-cv-00356-MMD-CSD

11 Plaintiff,

**STIPULATION TO EXTEND RESPONSE
DEADLINE TO DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT
[ECF 50] (Second Request)**

12 vs.

13 J. WEILAND, et al.,

14 Defendants.

17 Plaintiff, ANGEL JOEL GARCIA, by and through attorney of record, JAMES D.
18 URRUTIA, ESQ. of LJU LAW FIRM, and Defendants, SAUL AROZAGA, SEAN JOHNSON,
19 MACELYN KLEER, WILLIAMS REUBART, CHET RIGNEY, MATTHEW SEARLE, JAMES
20 WEILAND AND MATTHEW WILLHITE, by and through their attorney of record, VICTORIA
21 C. COREY ESQ., hereby submit their stipulation and agreement to extend the deadline for Plaintiff
22 to respond to Defendants' Motion for Summary Judgment [ECF 50] and respectfully request that
23 the Court extend the response deadline for a period of ninety (90) days, making Plaintiff's Response
24 to Defendants Motion for Summary due on October 9, 2023. The parties request is supported in
25 good cause.

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28 Defendants filed their Motion for Summary Judgment [ECF 50] on May 15, 2023.
Plaintiff's counsel appeared in the case on May 26, 2023. A Stipulated Confidentiality and
Protective Order was entered July 7, 2023. Defendants then produced the documents that were

1 previously filed under seal. As such, the parties have agreed to extend the response deadline to
2 October 9, 2023. As such, the parties have agreed to extend the response deadline to October 9,
3 2023.

4 Dated this 11th day of July, 2023.

5 **LJU LAW FIRM**

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7 */s/ James D. Urrutia*
8 JAMES D. URRUTIA, ESQ.
9 Nevada Bar No. 12885
10 5955 S. Edmond St., Ste. 12
11 Las Vegas, NV 89118
12 *Counsel for Plaintiff, ANGEL JOEL GARCIA*

Dated this 11th day of July, 2023.

OFFICE OF THE ATTORNEY GENERAL

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14
15 */s/ Victoria C. Corey*
16 VICTORIA C. COREY ESQ. (Bar No. 16364C)
17 555 E. Washington Ave., Ste. 3900
18 Las Vegas, NV 89101
19 *Counsel for Defendants SAUL AROZAGA,*
20 *SEAN JOHNSON, MACELYN KLEER,*
21 *WILLIAMS REUBART, CHET RIGNEY,*
22 *MATTHEW SEARLE, JAMES WEILAND*
23 *AND MATTHEW WILLHITE*

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28 **IT IS SO ORDERED.**

DATED: July 13, 2023


UNITED STATES MAGISTRATE JUDGE